

Exhibit 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

Laurel Clevenger

Member Case No. 4:22-cv-06457

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO DEFENDANTS'
REQUESTS FOR PRODUCTION OF
DOCUMENTS, SET ONE**

PROPOUNDING PARTY:

**META PLATFORMS, INC., *formerly known as Facebook, Inc.*; INSTAGRAM, LLC;
FACEBOOK PAYMENTS, INC.; SICULUS, INC.; FACEBOOK OPERATIONS, LLC;
BYTEDANCE, LTD.; BYTEDANCE, INC.; TIKTOK, LTD.; TIKTOK, LLC; TIKTOK,
INC.; and SNAP INC.**

RESPONDING PARTIES: Laurel Clevenger

SET: ONE

Plaintiff Laurel Clevenger, by and through her undersigned attorneys, hereby respond to Defendants' requests for production of documents as follows:

PRELIMINARY STATEMENT

Nothing in these responses should be construed as an admission by Plaintiffs with respect to the admissibility or relevance of any fact or document, or of the truth or accuracy of any characterization or statement of any kind contained in Defendants' Requests for Production. Plaintiffs have not completed their investigation of the facts relating to this case, their discovery or their preparation for trial. All responses and objections contained herein are based only upon such information and such documents that are presently available to and specifically known by Plaintiffs. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts and add meaning to known facts, as well as establish entirely

1 statements, juvenile justice records, criminal justice records, arrest records, court proceedings,
2 transcripts, conviction records, sentencing records, bail records, and supervision records.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

4 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
5 Plaintiff further objects to this request as unduly burdensome in that it seeks publicly accessible
6 information equally available to Defendants. Plaintiff further objects on the ground that the
7 information sought may contain sensitive, confidential, and privileged medical, mental health,
8 financial and/or other personal information sought solely for the purpose of harassment and not
9 relevant to the matters at issue in this litigation. Plaintiff further objects to this request as
10 overbroad to the extent it seeks documents pertaining to Plaintiff's "HOUSEHOLD members" or
11 "caretakers" other than her parents, as such documents are not likely to lead to information
12 relevant to any claims or defenses in this case. Plaintiff further objects to this request as unduly
13 burdensome to the extent it seeks documents pertaining to Plaintiff or her parents' status as a
14 "suspect" or "witness" in any criminal investigation or proceeding, as such documents are not
15 likely to lead to information relevant to any claims or defenses in this case. Plaintiff further
16 objects to this request to the extent it seeks documents that are not within the possession, custody,
17 or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it
18 seeks documents without limitation to the Relevant Time Period.

19 For these reasons, Plaintiff will not produce documents in response to this request.

20 **REQUEST FOR PRODUCTION NO. 33:**

21 All DOCUMENTS RELATING TO any civil court proceedings or investigations
22 involving YOU or YOUR parent(s), legal guardian(s), HOUSEHOLD members, or caretakers,
23 INCLUDING family court, juvenile court, neglect, truancy, divorce, or probate proceedings, and
24 any bankruptcies, foreclosures, repossessions, debt collection, or similar legal actions,
25 INCLUDING any prior sworn testimony by YOU.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

27 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
28 Plaintiff further objects to this request to the extent it seeks documents that are protected from

1 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
2 applicable privilege. Plaintiff further objects on the ground that the information sought may
3 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
4 personal information sought solely for the purpose of harassment and not relevant to the matters
5 at issue in this litigation. Plaintiff further objects to this request as unduly burdensome in that it
6 seeks publicly accessible information equally available to Defendants. Plaintiff further objects to
7 this request as unduly burdensome to the extent it seeks documents pertaining to Plaintiff's
8 "HOUSEHOLD members" or "caretakers" other than her parents, as such documents are not
9 likely to lead to information relevant to any claims or defenses in this case. Plaintiff further
10 objects to this request to the extent it seeks documents that are not within the possession, custody,
11 or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it
12 seeks documents without limitation to the Relevant Time Period.

13 For these reasons, Plaintiff will not produce documents in response to this request.

14 **REQUEST FOR PRODUCTION NO. 34:**

15 All DOCUMENTS RELATING TO any interaction with child protective services, child
16 and family services, foster care, adoption, or any other similar child welfare agency or
17 organization RELATING TO YOU or any current or past members of YOUR HOUSEHOLD.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

19 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
20 Plaintiff further objects to this request to the extent it seeks documents that are protected from
21 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
22 applicable privilege. Plaintiff further objects on the ground that the information sought may
23 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
24 personal information sought solely for the purpose of harassment and not relevant to the matters
25 at issue in this litigation. Plaintiff further objects to this request as vague and ambiguous with
26 respect to what "interaction" means. Plaintiff further objects to this request to the extent it
27 seeks documents that are not within the possession, custody, or control of Plaintiff.
28

1 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
2 limitation to the Relevant Time Period.

3 For these reasons, Plaintiff will not produce documents in response to this request.

4 **REQUEST FOR PRODUCTION NO. 35:**

5 All DOCUMENTS RELATING TO correspondence with any of YOUR school
6 counselors, teachers, medical health professionals, therapists, law enforcement, social workers,
7 friends, FAMILY, acquaintances, or anyone else RELATING TO YOUR MENTAL HEALTH
8 CONDITION or the allegations in the COMPLAINT or injuries alleged in this LAWSUIT. For
9 the avoidance of doubt, DEFENDANTS expressly do not request copies of any CSAM sent or
10 received. If YOU have materials responsive to this request that are CSAM, please include a list of
11 such materials without providing copies.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

13 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
14 Plaintiff further objects to this request to the extent it seeks documents that are protected from
15 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
16 applicable privilege. Plaintiff further objects on the ground that the information sought may
17 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
18 personal information sought solely for the purpose of harassment and not relevant to the matters
19 at issue in this litigation. To the extent this request seeks documents and information related to
20 Plaintiff's medical and mental health treatment, Plaintiff further objects to this request as
21 duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet.
22 Plaintiff further objects to this request as duplicative of Request for Production No. 36. Plaintiff
23 further objects to this request to the extent it seeks documents that are not within the possession,
24 custody, or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent
25 that it seeks documents without limitation to the Relevant Time Period.

26 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
27 responsive documents in accordance with the agreed-to data sources and search terms following
28 the Parties' meet and confer on same.

1 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
2 responsive documents in accordance with the agreed-to data sources and search terms following
3 the Parties' meet and confer on same.

4 **REQUEST FOR PRODUCTION NO. 66:**

5 All DOCUMENTS RELATING TO any break ups or rejections YOU have experienced
6 with a boyfriend, girlfriend, significant other, other romantic partner, or other individual YOU
7 pursued romantically.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 66:**

9 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
10 disproportionate to the needs of the case. Plaintiff further objects on the ground that the
11 information sought may contain sensitive, confidential, and privileged medical, mental health,
12 financial and/or other personal information sought solely for the purpose of harassment and not
13 relevant to the matters at issue in this litigation. Plaintiff further objects to this request as unduly
14 burdensome in that it seeks information in the possession of third parties. Plaintiff further objects
15 to this request as overbroad to the extent that it seeks documents without limitation to the
16 Relevant Time Period.

17 For these reasons, Plaintiff will not produce documents in response to this request.

18 **REQUEST FOR PRODUCTION NO. 67:**

19 All DOCUMENTS RELATING TO the death of any of YOUR FAMILY members,
20 HOUSEHOLD members, caretakers, friends, teachers, coaches, mentors, spiritual leaders, or
21 pets.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 67:**

23 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
24 disproportionate to the needs of the case. Plaintiff further objects on the ground that the
25 information sought may contain sensitive, confidential, and privileged medical, mental health,
26 financial and/or other personal information sought solely for the purpose of harassment and not
27 relevant to the matters at issue in this litigation. Plaintiff further objects to this request as unduly
28 burdensome in that it seeks information in the possession of third parties. Plaintiff further